



*Consulting Engineers  
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December 11, 2009  
(PBW Project No. 1536)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: November 2009 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – No actions were taken during the previous month as remaining activities specified in the UAO (except for continued preparation of these monthly status reports) were contingent upon receipt of EPA review comments on: (a) the Draft Updated Screening-Level Ecological Risk Assessment (SLERA) dated May 29, 2009; and the Draft Baseline Human Health Risk Assessment (BHHRA) dated August 31, 2009.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – Not taking into account an expedited work schedule that may result from the requested meeting described below, the following actions are planned for the next two months:

- Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – preparation of a Final Updated SLERA, and, pending receipt of EPA review comments on the Draft BHHRA, preparation of a Final BHHRA.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, a meeting was requested with EPA during the previous month to discuss performance of a tank removal action and other activities at the Site. Depending on the timing and outcome of that meeting, other activities beyond those described above may be performed during the next two months.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP